

EXHIBIT B

Portnoy, Samuel I.

From: Ari Weisbrot <aweisbrot@weisbrotlaw.com>
Sent: Thursday, July 9, 2020 5:38 PM
To: Portnoy, Samuel I.
Cc: Griffinger, Michael R.; Howells, Charlotte
Subject: Re: 1782 Draft Stipulation

Forget it. But you may hear from the NJ Law Journal, writing a piece about "Civility for Lawyers During Corona." Sorry. I tried to avoid this.

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From: Portnoy, Samuel I. <SPortnoy@gibbonslaw.com>
Sent: Thursday, July 9, 2020 5:25:16 PM
To: Ari Weisbrot <aweisbrot@weisbrotlaw.com>
Cc: Griffinger, Michael R. <MGriffinger@gibbonslaw.com>; Howells, Charlotte <CHowells@gibbonslaw.com>
Subject: RE: 1782 Draft Stipulation

Ari,

Now I am confused. The most recent version of the consent order we sent does not mention your family or any medical condition in any way. As soon as you objected to that language, we deleted it. Here is a clean version of the order. As for the other reasons you represented as the cause for your late filing, you told Mike this morning that you planned to file a letter with the Court that would identify those precise reasons and that those reasons would embarrass us, so I don't see how you can now say that a filing identifying them would humiliate you. If there is anything inaccurate in the way we have memorialized those reasons, please let me know and I'd be happy to work with you on edits. Otherwise, I still cannot see why the attached should not be entered. Thanks.

- Sam

Samuel I. Portnoy

Gibbons P.C.

One Gateway Center

Newark, NJ 07102-5310

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From: Ari Weisbrot <aweisbrot@weisbrotlaw.com>
Sent: Thursday, July 9, 2020 4:55 PM
To: Portnoy, Samuel I. <SPortnoy@gibbonslaw.com>
Cc: Griffinger, Michael R. <MGriffinger@gibbonslaw.com>; Howells, Charlotte <CHowells@gibbonslaw.com>
Subject: Re: 1782 Draft Stipulation

I am unclear. I sent you a stipulation that did not humiliate me or my family. It just agreed to a briefing schedule and withdrawal of your motion. If you do not accept it, just say so. By 530

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From: Portnoy, Samuel I. <SPortnoy@gibbonslaw.com>
Sent: Thursday, July 9, 2020 4:52:33 PM
To: Ari Weisbrot <aweisbrot@weisbrotlaw.com>
Cc: Griffinger, Michael R. <MGriffinger@gibbonslaw.com>; Howells, Charlotte <CHowells@gibbonslaw.com>
Subject: RE: 1782 Draft Stipulation

Ari,

I refer you to my email of 4:10. We are willing to sign a consent order. You have not pointed out anything inaccurate or inappropriate in the language we proposed. Instead, you simply threatened us with ultimatums and sanctions if we did not sign your version. Please proceed however you see fit. We remain willing to sign and submit the most recent version of the consent order that we sent to you. Thanks.

- Sam

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From: Ari Weisbrot <aweisbrot@weisbrotlaw.com>
Sent: Thursday, July 9, 2020 4:12 PM
To: Portnoy, Samuel I. <SPortnoy@gibbonslaw.com>
Cc: Griffinger, Michael R. <MGriffinger@gibbonslaw.com>; Howells, Charlotte <CHowells@gibbonslaw.com>
Subject: Re: 1782 Draft Stipulation

Thanks. Are you refusing to sign my proposed order? A simple yes or no will do. But please consider the ramifications. Just yes or no. Thanks

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From: Portnoy, Samuel I. <SPortnoy@gibbonslaw.com>
Sent: Thursday, July 9, 2020 4:10:24 PM
To: Ari Weisbrot <aweisbrot@weisbrotlaw.com>
Cc: Griffinger, Michael R. <MGriffinger@gibbonslaw.com>; Howells, Charlotte <CHowells@gibbonslaw.com>
Subject: RE: 1782 Draft Stipulation

Ari,

The version of the consent order we prepared provides precisely the relief you told Mike you were seeking. We also think it is important, and a benefit to you, to provide the Court with the reasons that you believe justify your late filing and failure to contact us about it. We remain willing to submit to the Court the most recent version of the Consent Order. You are, of course, free to proceed however you see fit. We will respond to any motion you may file as is appropriate, including by bringing to the Court's attention the perfectly reasonable stipulation we attempted to negotiate with you, and your communication in response. Thank you.

- Sam

Samuel I. Portnoy

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From: Ari Weisbrot <aweisbrot@weisbrotlaw.com>

Sent: Thursday, July 9, 2020 3:41 PM

To: Portnoy, Samuel I. <SPortnoy@gibbonslaw.com>

Cc: Griffinger, Michael R. <MGriffinger@gibbonslaw.com>; Howells, Charlotte <CHowells@gibbonslaw.com>

Subject: RE: 1782 Draft Stipulation

Nah. Ill give you 60 minutes to accept my proposed language. Then, I will file my own letter motion and seek sanctions. Let me know.



EISBROT LAW

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From: Portnoy, Samuel I. <SPortnoy@gibbonslaw.com>

Sent: Thursday, July 9, 2020 3:31 PM

To: Ari Weisbrot <aweisbrot@weisbrotlaw.com>

Cc: Griffinger, Michael R. <MGriffinger@gibbonslaw.com>; Howells, Charlotte <CHowells@gibbonslaw.com>

Subject: RE: 1782 Draft Stipulation

Ari,

Thank you for the revised version. Attached are our proposed edits. We think it is important to state the due date for your opposition and cross appeal to avoid any impression that our motion to strike was not validly grounded. We also think it is important to memorialize the representations that were made to us by you as the basis for the late filing and the basis for us agreeing that our motion is moot. As you will see, we are happy to remove the specific reference to your family's medical situation. The only reason it had been included was because it was my understanding that you intended to publicize it in a letter to the Court if we could not come to an agreement. [REDACTED]

Please let us know if this version is acceptable. Thank you.

- Sam

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From: Ari Weisbrot <aweisbrot@weisbrotlaw.com>

Sent: Thursday, July 9, 2020 2:51 PM

To: Portnoy, Samuel I. <SPortnoy@gibbonslaw.com>

Cc: Griffinger, Michael R. <MGriffinger@gibbonslaw.com>; Howells, Charlotte <CHowells@gibbonslaw.com>

Subject: RE: 1782 Draft Stipulation

Here are my proposed revisions. I assume you did not intend for us to publicize my family's medical conditions. Let me know if this works. Thanks .



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From: Portnoy, Samuel I. <SPortnoy@gibbonslaw.com>

Sent: Thursday, July 9, 2020 1:15 PM

To: Ari Weisbrot <aweisbrot@weisbrotlaw.com>

Cc: Griffinger, Michael R. <MGriffinger@gibbonslaw.com>; Howells, Charlotte <CHowells@gibbonslaw.com>

Subject: 1782 Draft Stipulation

Ari,

Here is a draft of the stipulation and consent order you have been discussing with Mike. Please let us know if we can add your signature and submit to the Court. Thanks.

- Sam

Samuel I. Portnoy

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